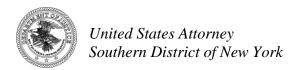
## **U.S. Department of Justice**



86 Chambers Street New York, New York 10007

February 14, 2020

## **BY ECF**

Honorable Paul A. Engelmayer United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Open Society Justice Initiative v. Central Intelligence Agency, et al.,

No. 19 Civ. 234 (PAE) (BCM)

Open Society Justice Initiative v. Department of Justice, et al.,

No. 19 Civ. 1329 (PAE) (BCM)

Dear Judge Engelmayer:

We write pursuant to the Court's October 3, 2019 order, ECF No. 100, to submit a joint status letter. The remaining defendant agencies in these consolidated cases are ODNI, CIA, State, and DOD.

**ODNI and CIA.** On December 9, 2019, CIA and ODNI filed their opening brief and other papers in support of their motion for summary judgment. *See* ECF Nos. 111-16. Plaintiff's cross-motion and response was filed on January 21, 2020. *See* ECF No. 120. As the Court is aware, the agencies have sought additional time to file their opposition and reply papers to permit CIA to conduct certain additional searches. The government will further address these matters, per the Court's order entered yesterday, in a letter to be filed by by 5pm on Tuesday, February 18. *See* ECF No. 134.

**State and DOD.** DOD has completed processing of all documents gathered in its searches. State is continuing processing consistent with the Court's orders.

We thank the Court for its attention to this matter.

Honorable Paul A. Engelmayer February 14, 2020

Page 2

Respectfully submitted,

By: /s/ Catherine Amirfar Catherine Amirfar (camirfar@debevoise.com) Matthew Forbes (mforbes@debevoise.com) Ashika Singh (asingh@debevoise.com) DEBEVOISE & PLIMPTON LLP 919 Third Avenue New York, New York 10022

Tel.: (212) 909-6000

Counsel for Plaintiff

Amrit Singh James A. Goldston OPEN SOCIETY JUSTICE INITIATIVE 224 West 57th Street New York, New York 10019

Tel.: (212) 548-0600

GEOFFREY S. BERMAN United States Attorney for the Southern District of New York

By: /s/ Peter Aronoff PETER ARONOFF NATASHA W. TELEANU **Assistant United States Attorneys** Telephone: (212) 637-2697/2528 Facsimile: (212) 637-2717 E-mail: peter.aronoff@usdoj.gov

natasha.teleanu@usdoj.gov

Counsel for Defendants